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Attorneys for Defendant

UNITED STATES DISTRICT COURT
 NORTHERN DISTRICT OF CALIFORNIA
 SAN FRANCISCO DIVISION

SHARON CHAND,)	No. 3:21-cv-07773-RS
)	
Plaintiff,)	JOINT REQUEST TO CONTINUE CASE
)	MANAGEMENT CONFERENCE;
v.)	ORDER
)	
MICHAEL S. REGAN, Administrator,)	Current CMC Date: January 12, 2023
Environmental Protection Agency,)	Time: 11:00 a.m.
)	
Defendant.)	
)	

Plaintiff Sharon S. Chand (“Plaintiff”), and Defendant Michael S. Regan (“Defendant”), by and through undersigned counsel, hereby STIPULATE and respectfully REQUEST that the Court vacate and continue the Case Management Conference (“CMC”), presently scheduled for January 12, 2023, for approximately 60 days until March 16, 2022, or until the Court rules on the outstanding Motion to Dismiss the Amended Complaint (Dkt. 35).

This action, filed on October 5, 2021, includes claims for employment discrimination. *See* Dkt. 1. Defendant was served on December 27, 2021. Defendant moved to dismiss the Complaint on February 25, 2022. *See* Dkt. 16. The Court dismissed the Complaint in part, *see* Dkt. 27, and Plaintiff filed an Amended Complaint to re-plead the dismissed claims on August 1, 2022. *See* Dkt. 32. Defendant moved to dismiss these claims on September 16, 2022. *See* Dkt. 35. On October 27, 2022,

the Court indicated that the motion would be submitted without oral argument. *See* Dkt. 41. The Court has not yet ruled on the motion.

While the parties exchanged General Order 71 disclosures on December 9, 2022, *see* Dkt. 43, the parties believe that holding the Initial Case Management Conference (and drafting a discovery plan) after a decision is issued on the pending Motion to Dismiss and the claims at issue are crystalized will conserve the resources of the parties and the Court.

Accordingly, the parties request that the CMC scheduled for January 12, 2023, be vacated and continued until March 16, 2022 or until the Court rules on the outstanding Motion to Dismiss the Amended Complaint (Dkt. 35).

SO STIPULATED.

Respectfully submitted,

STEPHANIE M. HINDS
United States Attorney

Dated: January 5, 2023

By: /s/ Michael A. Keough
MICHAEL A. KEOUGH
Assistant United States Attorney
Attorney for Defendants

Dated: January 5, 2023

By: **/s/ Sharon S. Chand
SHARON S. CHAND

Plaintiff *Pro Se*

** Pursuant to Civ. L.R. 5-1(h)(3), the filer of the document has obtained approval from this signatory.

ORDER

IT IS HEREBY ORDERED that the Case Management Conference, presently scheduled for January 12, 2023, is vacated. A Case Management Conference will be held on 3/16/2023 at 11:00 am. Joint Case Management Statement due 3/9/2023.

Dated: January 5, 2023



HON. RICHARD SEEBORG
United States District Judge